

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

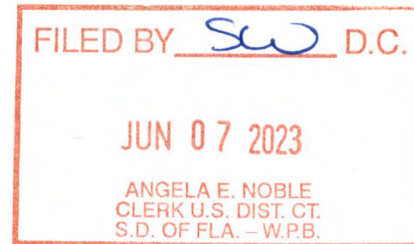
CASE NO. 23-CR-80079-CR-MIDDLEBROOKS/MATTHEWMAN

UNITED STATES OF AMERICA

vs.

SAEED JAMAL BROWN,

Defendant.



FACTUAL BASIS IN SUPPORT OF GUILTY PLEA

The United States of America and Defendant SAEED JAMAL BROWN (hereinafter “Defendant”) agree that had this case proceeded to trial, the United States would have proven the following elements and facts beyond a reasonable doubt as to the sole count of the Indictment, charging the Defendant with bank robbery with the use of a dangerous weapon, in violation of Title 18, United States Code, Sections 2113(a) and (d).

Elements

- First:** Defendant knowingly took money possessed by a federally insured bank from or in the presence of the person described in the indictment;
- Second:** Defendant did so by means of force and violence, or by means of intimidation; and
- Third:** Defendant knowingly assaulted a person or put the life of a person in jeopardy by using a dangerous weapon or device while stealing property or money from the bank.

Facts

1. On April 12, 2023, BROWN entered PNC Bank, located at 218 Datura Street, West Palm Beach, Florida. PNC Bank is a bank whose deposits are insured with the Federal Deposit Insurance Corporation. As he entered the bank, he brandished a BB gun air pistol, while wearing a bucket hat and wig with dreadlocks, a green long-sleeved shirt, navy pants, and a

surgical mask. He approached the teller's desk with the air pistol still brandished and demanded money. The teller gave him approximately \$1,681.00. No tracker was activated.

2. After leaving the bank, surveillance footage showed BROWN running out of the bank, through an alley, holding a broom, and then entering a white SUV. Ultimately, law enforcement officers were able to identify the SUV and locate it within Riviera Beach, Florida. Police officers conducted a traffic stop of the vehicle. The driver of the vehicle agreed to be interviewed by law enforcement at the West Palm Beach Police Department.

3. In a post-*Miranda* interview, the driver identified BROWN as the robber of the PNC Bank on April 12, 2023. She stated that BROWN had asked her for a ride, and she agreed. BROWN said that it was nothing illegal and would only take ten minutes or so. BROWN instructed her where to drive within West Palm Beach and where to park. The driver parked around the corner from the PNC Bank. After the driver parked, BROWN put on a bucket hat (matching the description of the hat seen on the robber) and took what resembled a black handgun out of his backpack before exiting the car. When BROWN came back to the car, he was running to the vehicle. BROWN jumped into the SUV and told the driver to go. According to the driver, BROWN had a broom and shoved a bucket hat and a dreadlock wig into his "backpack." The driver told law enforcement that BROWN said he had robbed a bank, and that he should have been there at 9 A.M. when there was more money, but he was late. BROWN told the driver to say that they had met on Facebook and that they don't know each other. BROWN then gave the driver \$400 in cash. The driver further stated that BROWN collected all the evidence and took it with him. The driver indicated the only thing in the car from the robbery would be \$400.00.

4. The driver dropped BROWN off at his apartment in Palm Beach County, Florida and watched him enter his apartment with a key. BROWN left the broom outside the front door of

the apartment.

5. Later that night, officers located and arrested BROWN outside of his apartment. Pursuant to a federal search warrant, officers searched the apartment. Officers located a Umarex XBG .177 BB gun air pistol, resembling the gun used during the robbery. Officers also found the broom.

6. During a post-*Miranda* recorded interview, BROWN confessed to robbing PNC Bank. He further indicated that he gave a friend everything from the robbery. He indicated the gun was "fake," he put everything in a "bag," and told a friend to throw it in a dumpster near a Family Dollar store. Further, during the interview, BROWN requested his phone. BROWN then texted a family member that he robbed a bank.

7. During a search of the vehicle pursuant to consent, officers located approximately \$470.00 cash.

8. All events having occurred in the Southern District of Florida and elsewhere.

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

Date: 6/7/2023

By: Shannon O'Shea Darsch
SHANNON O'SHEA DARSCH
ASSISTANT UNITED STATES ATTORNEY

Date: 6/7/23

By: McCr
CAROLINE McCRAE
ASSISTANT FEDERAL PUBLIC DEFENDER

Date: 6/7/23

By: Saeed J Brown
SAEED JAMAL BROWN
DEFENDANT